

# **EXHIBIT B**



BAILEY DUQUETTE P.C.

January 17, 2023

**BY EMAIL/EPayne@gibsondunn.com**

Erica Sollazzo Payne, Esq.  
Gibson, Dunn & Crutcher LLP  
200 Park Avenue  
New York, NY 10166-0193

Re: In re Application of Forensic News LLC & Scott Stedman  
for an Order Pursuant to 28 U.S.C. § 1782 to Conduct  
Discovery for Use in a Foreign Proceeding, No. 22-MC-0229

Dear Erica:

Along with Michael Nadler of Stumphauzer Kolaya Nadler & Sloman PLLC, we represent third-party Mark Rossini.

We write at your request to confirm that at the outset of Mr. Rossini's January 13, 2023 third-party deposition, we asserted on Mr. Rossini's behalf the Fifth Amendment act-of-production privilege with respect to the documents the § 1782 Subpoena requested he produce.

So as to avoid any allegations of gamesmanship or dilatory tactics later, we also put you on notice that, in an absence of Mr. Rossini asserting the Fifth Amendment act-of-production privilege, he would assert the attorney-client privilege, work-product immunity and litigation privilege (under UK law) with respect to the responsive documents (because Mr. Rossini is asserting the Fifth Amendment act-of-production privilege, no log is being provided).

Very truly yours,

David I. Greenberger  
Bailey Duquette P.C.  
O: (212) 658-1946 ext. 204  
E: [david@baileyduquette.com](mailto:david@baileyduquette.com)

cc: Michael Nadler, Esq.